IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA, Plaintiff,

vs. JOHN LOPEZ, 22-cr-2053-MLG

Defendant.

DEFENDANT'S UNOPPOSED MOTION TO RESET FORFEITURE AND FINANCIAL DISCLOSURE HEARING ON APRIL 7, 2025

COMES NOW, John Lopez, through undersigned counsel, and hereby requests that the Forfeiture and Financial Disclosure Hearing scheduled on April 7, 2025, be reset from 1:30 p.m. to 2:30 p.m.

- 1. On September 26, 2024, after a jury trial was completed, the jury returned a guilty verdict against Mr. Lopez.
- 2. On April 7, 2025, a hearing for Forfeiture and Financial Disclosure is scheduled, which requires Mr. Lopez's presence, at 1:30 p.m.
- 3. Counsel for Mr. Lopez has two previously scheduled plea hearings set for 1:30 p.m. on April 7, 2025, and cannot attend the Forfeiture and Financial Disclosure Hearing at that time.
- 4. As such, Mr. Lopez requests that the Court reset the Forfeiture and Financial Disclosure Hearing from 1:30 p.m. to 2:30 p.m. on April 7, 2025.
- 5. Mr. Lopez has contacted the Assistant United States Attorney in this matter for the government's position, which is unopposed to this Motion.

WHEREFORE, for the foregoing reasons, Mr. Lopez respectfully requests that the Court reset the Forfeiture and Financial Disclosure hearing scheduled on April 7, 2025, from 1:30 p.m. to 2:30 p.m.

Respectfully Submitted,
/s/ Britany Schaffer
Ahmad Assed
Britany J. Schaffer
Ahmad Assed & Associates
818 5th Street NW
Albuquerque, NM 87102

/s/ Joel R. Meyers

Joel R. Meyers
The Law Office of Joel R. Meyers LLC
1000 Cordova Place, #930
Santa Fe, NM 87505
jrm@jrmeyerslaw.com
(505) 847-7757
(505) 847-5929 FAX

/s/ Shaheen P. Torgoley

Ryan, Rapp, Pacheco & Sorenson, PLC 3200 N. Central Avenue, Suite 2250 Phoenix, Arizona 85012 storgoley@rrpklaw.com (602) 707-1383

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of April, 2025, I filed the foregoing electronically through the CM/ECF system, which caused Counsel for the Plaintiff to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

Frederick Mendenhall Fred Federici Assistant United States Attorneys United States Attorney's Office 201 Third Street NW, Suite 900 Albuquerque, NM 87103

<u>/s/ Britany Schaffer</u> Attorney for Defendant